

GLENN S. RICHARDS
202-663-8215
glenn.richards@shawpittman.com

ORIGINAL

EX PARTE OR LATE FILE

January 20, 2004

Via Hand Delivery

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: pulver.com
Ex Parte Presentation
WC Docket No. 03-45**

Dear Ms. Dortch:

In response to a request from Commission staff, pulver.com provides the following additional information concerning its Free World Dialup (FWD) service.

First, FWD members can have calls simultaneously terminate to multiple locations. This is done through a feature of SIP called "Multiple Presence" that allows members to have the same FWD number registered in multiple locations at the same time. While all FWD members are free to take advantage of this feature, pulver.com uses this feature for the volunteers who staff its 55555 welcome line. For these volunteers, FWD provides in effect a 'virtual office' with a shared phone number across geographic boundaries in up to 25 cities/locations around the world. Only one phone may be answered on a shared number. This is similar in use to a single number for a call center reaching a (potentially) random but available agent.

Second, FWD provides a conference call bridge capability. The FWD bridge provides 'virtual' rooms identified by a numeric code. These conference 'rooms' can terminate any number of IP-based voice streams, which are mixed and sent back to all participants on the bridge using the Internet.

Finally, there are currently about 141,000 registered FWD members. Approximately 45,000 identify themselves with an address in the United States. There are members from every state and certain US territories.

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ShawPittman LLP

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Please direct any questions regarding this matter to the undersigned

Very truly yours,

A handwritten signature in black ink, appearing to read "Glenn Richards", written in a cursive style.

Glenn S. Richards

cc Julie Veach
Terry Natoli

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